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*Counsel for the Debtors and  
Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

GVS TEXAS HOLDINGS I, LLC, *et al.*,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 21-31121-MVL

**(Jointly Administered)**

**Confirmation Hearing Date: March 16, 2022 at 9:30  
a.m. CT**

**Plan Supplement Objection Deadline: March 15, 2022  
at 4:00 p.m. CT**

**NOTICE OF FILING OF AMENDMENT TO SECOND PLAN SUPPLEMENT**

**PLEASE TAKE NOTICE THAT** on February 2, 2022, the United States Bankruptcy Court for the Northern District of Texas (the “Court”) entered an order [Docket No. 631] (the “Order”) in the jointly administered chapter 11 cases of GVS Texas Holdings I, LLC and its affiliated debtors and debtors in possession (collectively, the “Debtors”): (a) approving the *Fourth Amended Disclosure Statement for the Joint Chapter 11 Plan of Reorganization for GVS Texas Holdings I, LLC and its Debtor Affiliates* (the “Disclosure Statement”) as containing “adequate

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: GVS Texas Holdings I, LLC (7458); GVS Texas Holdings II, LLC (1225); GVS Portfolio I, LLC (6441); GVS Portfolio I B, LLC (7171); GVS Portfolio I C, LLC (3093); WC Mississippi Storage Portfolio I, LLC (0423); GVS Nevada Holdings I, LLC (4849); GVS Ohio Holdings I, LLC (6449); GVS Missouri Holdings I, LLC (5452); GVS New York Holdings I, LLC (5858); GVS Indiana Holdings I, LLC (3929); GVS Tennessee Holdings I, LLC (5909); GVS Ohio Holdings II, LLC (2376); GVS Illinois Holdings I, LLC (9944); and GVS Colorado Holdings I, LLC (0408). The location of the Debtors’ service address is: 814 Lavaca Street, Austin, Texas 78701.

information” pursuant to section 1125 of the Bankruptcy Code; (b) approving the solicitation materials and other related documents; (c) approving procedures for filing objections to the *Fourth Amended Joint Chapter 11 Plan of Reorganization for GVS Texas Holdings I, LLC and its Debtor Affiliates* (as may be modified, amended, or supplemented from time to time, the “Plan”);<sup>2</sup> and (d) granting related relief.

**PLEASE TAKE FURTHER NOTICE** that on March 8, 2022, the Debtors filed the Plan Supplement [Docket No. 778].

**PLEASE TAKE FURTHER NOTICE** that on March 10, 2022, the Debtors filed the Second Plan Supplement [Docket No. 796] (the “Second Plan Supplement”) and the Third Plan Supplement [Docket No. 797] (the “Third Plan Supplement”).

**PLEASE TAKE FURTHER NOTICE** that the Debtors hereby file an amendment to the Second Plan Supplement by replacing the Reserve Proposal attached thereto as Exhibit 1 with the amended Reserve Proposal attached hereto as Exhibit 1.

**PLEASE TAKE FURTHER NOTICE** that the deadline for filing objections to the Plan solely on the basis of the Plan Supplement, the Second Plan Supplement, or the Third Plan Supplement is **March 15, 2022 at 4:00 p.m.** prevailing Central Time (the “Plan Supplement Objection Deadline”). Any objection **must**: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Rules, and any orders of the Court; (c) state, with particularity, the basis and nature of any objection and, if practicable, a proposed modification to the Plan that would resolve such objection; and (d) be filed with the Court (contemporaneously with a proof of service) and served upon the following parties so as to be actually received on or before the Plan Supplement Objection Deadline:

The Debtors
<p style="text-align: center;">GVS Texas Holdings I, LLC Attn: Robert D. Albergotti 1085 Old Clemson Hwy, Ste. E-205 Seneca, SC 29672-8028</p>
Counsel to the Debtors
<p style="text-align: center;">Sidley Austin LLP Attn: Juliana Hoffman 2021 McKinney Ave Suite 2000 Dallas, Texas 75201 Telephone: (214) 981-3300 Facsimile: (214) 981-3400</p>

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the same meaning as set forth in the Plan or the Debtors’ Motion for Entry of an Order (I) Approving the Adequacy of the Amended Disclosure Statement, (II) Approving the Forms of Ballots and Notices in Connection with Confirmation of the Plan, (III) Scheduling Certain Dates with Respect Thereto, and (IV) Granting Related Relief [Docket No. 351], as applicable.

U.S. Trustee
Lisa Lambert Elizabeth Young Asher Bublick Earle Cabell Federal Bldg 1100 Commerce St, Rm 976 Dallas, TX 75242 Facsimile: 214-767-8967 Email: ustpreion06.da.ecf@usdoj.gov

**PLEASE TAKE FURTHER NOTICE** that if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement, or related documents, you may (1) contact the Debtors' Solicitation Agent, Omni Agent Solutions ("Omni"), by (a) calling the Debtors' restructuring hotline at 866-956-2143 (US & Canada) or 818-646-2219 (International); (b) writing to GVS Texas Holdings I, Ballot Processing, c/o Omni Agent Solutions, 5955 De Soto Ave., Suite 100, Woodland Hills, CA 91367; and/or (c) emailing [gvsballots@omniagnt.com](mailto:gvsballots@omniagnt.com); or (2) download such documents (excluding ballots) from the Debtors' restructuring website at <https://omniagentsolutions.com/gvs>. Copies of these documents may also be obtained for a fee via PACER which can be accessed on the Court's website.

**ARTICLE VIII** OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS. THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

Dated: March 11, 2022

Respectfully submitted,

**SIDLEY AUSTIN LLP**

/s/ Thomas R. Califano

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**Exhibit 1****Reserve Proposal<sup>1</sup>**

<b><u>Claim</u></b>	<b><u>Estimated Amount</u></b>	
RREF (Disputed 9019 Settlement Reserve)	\$30,000,000.00	
Great Value Storage (post-petition management fees)	\$517,000.00	
Great Value Storage, LLC (filed claim)	\$305,000.00	
Melvin Van Brookshire (interest claim)	\$65,579.88	
Seth Kretzer, as Receiver	\$3,500,000.00	
Princeton Capital Corporation	\$15,000,000.00	
Barclays Trust	\$10,600,000.00	
Customer Claims <sup>2</sup>	\$680,000.00	
<b>Total Disputed Claims</b>		<b>\$60,667,579.88</b>
<b>Pre-Effective Date Professional Fees</b>		<b>\$5,250,000.00</b>
<b>Post-Effective Date Professional Fees</b>		<b>\$2,500,000.00</b>
<b>UST Fees</b>		<b>\$1,250,000.00</b>
<b>Title Company Reserves</b>		<b>\$5,000,000.00</b>
<b>Contingency Reserve<sup>3</sup></b>		<b>\$14,933,515.98</b>
<b>TOTAL</b>		<b>\$89,601,095.86</b>

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<sup>1</sup> Unsecured claims include estimates for post-petition interest at the Federal Judgment Rate pursuant to the Plan.

<sup>2</sup> The Debtors are in the process of reviewing Claims filed by self-storage customers.

<sup>3</sup> This is calculated at 20% of the total of the reserve amounts.